

ADMINISTRATIVE COMPLETENESS REVIEW WORKSHEET (R645-301-150)

DATE: February 23, 1999
 REVIEWER(S): Robert Davidson, David Darby, Wayne Western, Paul Baker, and Jim Smith
 APPLICANT: UtahAmerican Energy, Inc.
 MINE NAME: Horse Canyon/Lila Canyon FILE NO. ACT/007/013, File #2

"Administratively Complete Application" means an application for permit approval or approval for coal exploration, where required, which the Division determines to contain information addressing each application requirement of the State Program and to contain all information necessary to initiate processing and public review.

Directions: The categories listed below correspond to the minimum requirements for information necessary to initiate processing and public review. If a category is checked the Applicant has met the Completeness requirement for that category. If a category is not checked, the Completeness requirements have not been met. The comments column will identify the deficiency and what is necessary to correct it.

		Comments
301-112	Identification of Interests <u>X</u>	
100	Applicant's Business Structure <u>X</u>	
210	Applicant's Name/Address/Phone <u>X</u>	
220	Resident Agent's Name/Address/Phone <u>X</u>	
230	Name/Address/Phone of AML Fees Payer <u>X</u>	

300	Corporate Structure & Ownership	<u> X </u>	
400	Identify Other Mining Operations in US	<u> X </u>	
500	Surface & Mineral Ownership	<u> X </u>	
600	Ownership Contiguous to Permit	<u> X </u>	
700	MSHA Numbers	<u> X </u>	The MSHA number shown in the application is for the Horse Canyon Mine. This section can be considered administratively complete, but the applicant will need to include the new numbers when they become available.
800	Interest in Contiguous Lands	<u> X </u>	Application contains conflicting information but, considered administratively complete.

301-113	Violation Information	<u> X </u>	
100	Suspension or Revocation Information	<u> X </u>	
300	List of Violations - 3 Previous Years	<u> X </u>	

301-114	Right of Entry	<u>X</u>	<p>Considered administratively complete; however, full right of entry has not yet been given by the BLM. The application contains a copy of a letter from the BLM indicating they have received five right-of-way applications for various facilities associated with the mine. There is no indication that rights-of-way have been granted. The area involved includes most of the surface facilities area.</p> <p>Plate 5-4 indicates the state owns mineral rights in a 40-acre piece of land, and there is no right of entry from the state for this piece. It appears, however, Plate 5-4 is in error and that this is part of a federal lease.</p>
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301-115	Status of Unsuitability Claims	<u>X</u>	The application contains a letter from Jay Marshall to the Emery County road supervisor requesting approval to mine within 100 feet of the county road. The application will need to contain approval from Emery County for mining within 100 feet of a public road.
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301-116	Permit Term	<u>X</u>	
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301-117	<p>....Insurance</p> <p>....Proof of Publication</p> <p>....Facilities and Structures Used in Common</p>	<p><u>X</u></p> <p><u>X</u></p> <p><u>X</u></p>	<p>Insurance policy included, but it does not meet regulatory requirements.</p> <hr/> <p>Proof of publication would need to be submitted after advertising is complete.</p> <hr/>
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301-118	Filing Fee	<u>X</u>	Filing fee not required for revisions.
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301-123	Notarized Signature of Responsible Official <u> X </u>	
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301-130	Information Collection: Technical Data Accompanied by Names of Persons or Organizations that Collected and Analyzed the Data - Dates of Collections - and Analysis of the Data and Description of the Methodology Used to Collect and Analyze Data <u> X </u>	
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301-200	Soils <u> X </u>	
211	Description of Pre-mining Soil Resources <u> X </u>	The primary soil within the disturbed area is Strych, with other areas of Travessilla, Rockland, Rock outcrop & Gerst.
212	Soil Resource Protection Measures <u> X </u>	150 K cubic yards of soil is available for salvage, but the plan only calls for 40 K cubic yards of soil salvage.
221	Prime Farmland Investigation <u> X </u>	The NRCS has determined that there is no Prime Farmland within the Permit area.
222-223	Soil Survey and Soil Characterization <u> X </u>	Plan gives an intensive soil survey which is adequate for assessing soil resources.
224	Substitute Topsoil Info (When Proposed) <u> X </u>	The PAP states that none is required. However, the refuse pile will require 4 feet of soil, not the 32" as stated.
230	Operation Plan: Topsoil Handling/Removal/Storage <u> X </u>	The PAP only calls for 40 K cubic yards of soil salvage, whereas 150 K is available for salvage.
240	Reclamation Plan: Soil Redistribution/Stabilization <u> X </u>	Still contains nonsensical material concerning backfilling adjacent cut slopes from adjacent pad areas.

301-130	Information Collection: Technical Data Accompanied by Names of Persons or Organizations that Collected and Analyzed the Data - Dates of Collections - and Analysis of the Data and Description of the Methodology Used to Collect and Analyze Data	<u> X </u>	
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301-300	Biology	<u> X </u>	
320	Vegetation Information	<u> X </u>	It appears the information is administratively complete but not technically adequate; however, without maps showing the precise area of disturbance, it is impossible to say if all proposed disturbed areas were included in sampling.
322	Fish and Wildlife Information	<u> X </u>	The application contains a survey for rare plant and animal species, but it will need further information about a listed and a proposed endangered species. Raptor nesting locations need to be clarified.
323	Maps/Photos: Vegetation-Fish-Wildlife Areas	<u> X </u>	
330	Operation Plan: Vegetation-Fish-Wildlife Protection	<u> X </u>	
341	Reclamation Plan for Revegetation	<u> X </u>	
342	Fish & Wildlife Plan for Reclamation Phase	<u> X </u>	

301-400	Land Use and Air Quality	<u> X </u>	
411	Pre-Mining Land Use Information (Includes Cultural Resources)	<u> X </u>	Cultural resources information needs to be identified as confidential.

412	Post-Mining Land Use Information	<u> X </u>	
420	Air Quality	<u> X </u>	

301-500	Engineering	<u> X </u>	
510 and 521	General Description of Operation Plan: (Maps, Locations, Cross-Sections, Narrative, Descriptions & Calculations)	<u> X </u>	<p>R645-301-121.200. The Permittee states in Section 512.260 that certified designs for the AOC variance are in the PAP. However, the PAP does not have plans that involve a variance to AOC. The Permittee must either provide the plans or remove the comments from the PAP. This issue will not result in the Division finding the PAP administratively incomplete.</p> <p>R645-301-512. Some plans such as the road designs (Figure 1 Appendix 5-4) and the refuse piles (Figure 1 Appendix 5-7) were not certified. This issue will not result in the Division finding the PAP administratively incomplete.</p>
522	Coal Recovery Description	<u> X </u>	This section is administratively complete.
523	Mining Methods	<u> X </u>	This section is administratively complete.
524	Blasting and Explosives Plan	<u> X </u>	This section is administratively complete.

525	Subsidence Control Plan	<u> X </u>	<p>R645-301-525.100 requires that the Permittee provide the Division with a map of the permit area at a scale of 1:12,000 or larger that shows the areas where subsidence could occur. Plate 5-5 shows the proposed subsidence area. However, the map has a scale of 1:24,000 (1 inch equals 2000 ft) not the required scale of 1:12,000. This issue will not result in the Division finding the PAP administratively incomplete.</p> <p>R645-301-525.440 requires that the Permittee describe the subsidence monitoring plan. The Permittee does not give details of the subsidence monitoring plan. The only information about the plan is that it will involve ground and aerial surveys. This issue will not result in the Division finding the PAP administratively incomplete.</p> <p>R645-301-121.300 requires the Permittee to submit the PAP in the format required by the Division. The format used by the Permittee in the subsidence section of the PAP does not correspond to the format in the Utah Coal Rules Revised May 1, 1988. This issue will not result in the Division finding the PAP administratively incomplete.</p>
526	Mine Facilities Description (Narrative, Plans, Maps) Including Existing Structures & Support Facilities	<u> X </u>	
527	Transportation Facilities (Including Plans & Maps)	<u> X </u>	<p>R645-301-527.200 The Permittee states that the conveyor system is described in Appendix 5-4. There is no description of a conveyor system in Appendix 5-4. The conveyor system is shown on Plate 5-2. This issue will not result in the Division finding the PAP administratively incomplete.</p>
528	Coal Mine Waste Plans (Description & Designs)	<u> X </u>	
529	Management of Mine Openings (Design)	<u> X </u>	This section is administratively complete.
531	General Plans for Structures	<u> X </u>	This section is administratively complete.

532	Sediment Control <u>X</u>	This section is administratively complete.
533	Impoundments <u>X</u>	This section is administratively complete.

301-534	Roads (Plans, Drawings, Designs, & Specifications) <u>X</u>	This section is administratively complete.
535	Spoil <u>X</u>	This section is administratively complete.
536	Coal Mine Waste <u>X</u>	This section is administratively complete.
537	Regraded Slopes <u>X</u>	This section is administratively complete.
540 541-542	Reclamation Narrative, Maps and Plans <u>X</u>	This section is administratively complete.
551	Casing and Sealing: Underground Openings <u>X</u>	This section is administratively complete.
553	Backfilling and Grading Description <u>X</u>	This section is administratively complete.

301-800	Bonding and Insurance <u>X</u>	
820	Applicant: Have Adequate Bond at Permit Issuance <u>X</u>	This section is administratively complete.
830	Bond Estimate and Calculations Provided <u>X</u>	This section is administratively complete.
890	Certificate of Insurance Provided <u>X</u>	This section is administratively complete.

301-600	Geology <u> X </u>	
621	Description of Geology (Permit & Adjacent Area) <u> X </u>	
622	Geologic Cross-Sections, Maps, and Plans <u> X </u>	
630	Plans for Casing and Sealing Holes <u> X </u>	Page 83, Volume 6

301-700	Hydrology <u> X </u>	Volume 6 & 7
721	Description of Hydrologic Resources: (Permit and Adjacent Area) <u> X </u>	Volume 6
722	Cross-Sections and Maps: Subsurface Water - Surface Water - Monitoring Stations - Wells <u> X </u>	Plate 7-1, 7-4
723	Sampling and Analysis <u> X </u>	Appendix 7-1
724	Baseline Information: Ground Water - Surface Water - Geology - Climatological & Supplemental; If Needed <u> X </u>	Chapters 6 & 7, Volumes 5 & 6
728	PHC Determination <u> X </u>	Appendix 7-3
730	General Operation Plan: Minimize Disturbance to Hydrologic Balance & Compliance with Clean Water Act <u> X </u>	Chapter 7, Volume 6, Page 24
731	Ground and Surface Water Protection <u> X </u>	Volume 6

732	Ground and Surface Water Monitoring	<u>X</u>	The Applicant should submit detailed information to define the groundwater regime. Data defining groundwater movement and velocity should be provided to determine any future impacts.
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301-740	Plans and Designs: Operation and Reclamation Plan Sediment Control Measures	<u>X</u>	Volume 7, Appendix 7-4
Siltation Structures	<u>X</u>	Volume 7
Sediment Ponds	<u>X</u>	Volume 7
Other Treatment Facilities	<u>X</u>	Volume 7
Diversions	<u>X</u>	Volume 7
Road Drainage	<u>X</u>	Appendix 5-4
Impoundments	<u>X</u>	Volume 7
Discharge Structures	<u>X</u>	Volume 7
Disposal of Excess Spoil	<u>X</u>	Volume 4
Coal Mine Waste	<u>X</u>	Volume 4
Disposal of Non-Coal Mine Waste	<u>X</u>	Volume 4, Page 59
Casing and Sealing of Wells	<u>X</u>	Volume 7, Chapter 7, Page 84

301-800	Bonding and Insurance	<u>X</u>	
820	Applicant: Have Adequate Bond at Permit Issuance	<u>X</u>	This section is administratively complete.
830	Bond Estimate and Calculations Provided	<u>X</u>	This section is administratively complete.

890	Certificate of Insurance Provided <u>X</u>	This application is administratively complete.
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302-300	Special Areas of Mining <u>X</u>	
301	Prime Farmland <u>X</u>	
302 through 321	Alluvial Valley Floors <u>X</u>	The applicant must either affirmatively demonstrate, based on available data, the presence of an AVF, or submit field investigations results of the proposed permit and adjacent area to allow the Division to make this determination based on detailed information supplied in the PAP for geologic, hydrologic, land use, soils, and vegetation.